

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

Wireline Competition Bureau Seeks Comment	)	
on Requests for Review of	)	CC Docket No. 96-45
USAC Administrator Decisions Regarding	)	
Mobile Line Count Reporting	)	WCB Docket No. 05-337

**COMMENTS OF VERIZON AND VERIZON WIRELESS<sup>1</sup>**

The Universal Service Administrative Company (USAC) erred in determining that certain mobile lines were ineligible for past universal service fund (USF) support based on AT&T's reporting of the associated customer billing addresses. In reaching that decision, USAC concluded that — for mobile customers using P.O. Boxes as their billing address — the street address of the relevant post office had to be used as the customer address for determining USF support. But, as AT&T advocates, the industry practice of assigning a P.O. Box customer to the ILEC study area based on the centroid of the customer's zip code was a more appropriate standard – or, at the very least, a reasonable approach that is consistent with the Commission's rules.<sup>2</sup> Moreover, it would be a waste of resources to require AT&T to implement an all-new methodology when wireless eligible telecommunications carriers (ETCs) no longer are required to report line counts at all. For these reasons, USAC's decision should be reversed.

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<sup>1</sup> In addition to Verizon Wireless, the Verizon companies participating in this filing are the regulated, wholly owned subsidiaries of Verizon Communications Inc. ("Verizon").

<sup>2</sup> See AT&T, *Request for Review by AT&T of Decision of the Universal Service Administrator*, CC Docket No. 96-45, WC Docket No. 05-337 (June 22, 2012); see also, AT&T, *Request for Review by AT&T of Decision of the Universal Service Administrator*, CC Docket No. 96-45, WC Docket No. 05-337 (Apr. 16, 2013).

## **DISCUSSION**

Pursuant to 47 C.F.R. § 54.307(a), competitive ETCs — including wireless providers — were eligible to receive federal high-cost universal service support for each line served within their designated ETC service areas. The Commission changed its approach, determining in the *USF-ICC Transformation Order* that wireless ETCs no longer were required to report line counts as of January 1, 2012, and phasing out competitive ETC support altogether.<sup>3</sup> But, prior to that time, to determine whether a mobile line was within the designated service area, competitive ETCs providing wireless service had to rely on the billing address provided by the subscriber:

[...] Competitive eligible telecommunications carriers providing mobile wireless service in an incumbent LEC's service area shall use the customer's billing address for purposes of identifying the service location of a mobile wireless customer in a service area.<sup>4</sup>

In some instances, a subscriber may have provided the wireless ETC service provider with a P.O. Box address in lieu of a street address. This situation arose, for example, where postal route delivery service was unavailable in rural and sparsely populated areas. As a result, the wireless ETC was required to rely on the P.O. Box and zip code information provided by the subscriber to identify the subscriber's service location for universal service support purposes.

Consistent with 47 C.F.R. § 54.307(a), AT&T utilized industry-standard software to “map” (or “geocode”) a subscriber's street address or P.O. Box (if the street address was unavailable) to an incumbent ETC's study area, wire center or cost zone, as applicable. Correlating a subscriber's billing address with an ILEC service area was necessary because, under the Commission's previous USF rules, the support available to wireless ETCs was tied to

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<sup>3</sup> See *Connect America Fund, et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, ¶ 521 (2011).

<sup>4</sup> 47 C.F.R. § 54.307(b).

the corresponding ILEC's funding.

The same process used to geocode a subscriber's address and to correlate that address with an ILEC service area was used to geocode a P.O. Box address. However, for P.O. Box addresses, the industry-standard mapping software geocoded the P.O. Box to the zip code centroid – *i.e.*, the geographic center of the zip code. This is because a P.O. Box address on its face does not contain a street address at all, whether it be the street address of the corresponding post office or otherwise. To further map a P.O. Box address to a corresponding post office would require a manual procedure.

AT&T followed this industry-standard approach in the instant case. However, USAC rejected that approach – instead insisting that, in determining whether a mobile customer using a P.O. Box as a billing address was within the service area for line count purposes, AT&T had to use the physical address of the relevant post office as the customer's location. That decision was in error.

There is nothing in the Commission's rules that prohibits wireless carriers from relying on standard industry geocoding practices to map a P.O. Box address to the zip code centroid. Indeed, despite having multiple proceedings pending on this issue over the last few years, the Commission has never suggested that geocoding to the zip code centroid was in any way inappropriate.<sup>5</sup> By contrast, using the post office address as the customer's location is guaranteed to result in an inaccurate street address. The post office is one place where the customer is certain not to actually reside. And, indeed, a post office street address is very likely

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<sup>5</sup> See Public Notice, *Wireline Competition Bureau Seeks Comment on Requests for Review of Administrator Decisions Regarding Mobile Line Count Reporting*, CC Docket No. 96-45, WC Docket No. 05-337, at 1 n.3 (2013) (listing petitions currently pending before the Commission).

not a reasonable proxy for the customer's actual location because in many cases customers use P.O. boxes precisely because their homes are in remote locations far from population centers where post offices are typically located.

### **CONCLUSION**

For the reasons set forth above, the Commission should grant AT&T's petitions and reverse USAC's decision.

Respectfully submitted,

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